

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
JONESBORO DIVISION

OLD ST. PAUL MISSIONARY
BAPTIST CHURCH

PLAINTIFF

V.

NO. 3:07-cv-00043 WRW

FIRST NATION INSURANCE GROUP;
AA RISK MANAGEMENT, INC.;
AA COMMUNICATIONS, INC.;
GWEN MOYO; CRAIG GREENE;
JOHN DOES 1-10;
DOE COMPANIES 1-10

DEFENDANTS

MOTION TO ENLARGE TIME

COME NOW the Defendants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene, by and through counsel, and move, for cause shown and pursuant to F.R.C.P. 6(b), that the time for them to answer or respond to Plaintiff's Motion to Strike Defendants' Answer and Notice of Removal, Objection to Removal and Motion to Remand be extended by thirty days (30) from the date of the entry of an Order adjudicating the Joint Motion for Leave to Withdraw as Counsel filed contemporaneously herewith.

WHEREFORE, the Defendants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene, request that this motion be granted and that the time for each of them to respond to the Plaintiff's Motion to Strike Defendants' Answer and Notice of Removal, Objection to Removal, and Motion to Remand be enlarged as requested herein.

Respectfully,

HARDIN & GRACE, P.A.
Attorneys for Defendants
500 Main Street, Suite A
P.O. Box 5851
North Little Rock, AR 72119-5851
Telephone: (501) 378-7900
Facsimile: (501) 376-6337

By: /s/David A. Grace
David A. Grace
State Bar No. 76-044

AND

LESS, GETZ & LIPMAN
Attorney for Defendants
100 Peabody Place, Suite 1150
Memphis, Tennessee 38103
Telephone: (901) 525-8700
Facsimile: (901) 525-3569

By: /s/Justin R. Giles, III
Justin R. Giles, III
TN Bar No. 24123

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2007, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to:

Mr. Lawrence W. Jackson
RIEVES, RUBENS & MAYTON
P.O. Box 1359
West Memphis, AR 72303

I hereby certify that a copy of the foregoing was served on the non-ECF participants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene, via U.S. Mail, Certified Mail, Return Receipt Requested, postage prepaid, this 15th day of May, 2007, to the following addresses:

Gwen Moyo
8000 GSRI Avenue
Building 3000, Room128
Baton Rouge, LA 70820

AA Risk Management, Inc.
261 Oakmont Drive
New Orleans, LA 70128

First Nation Insurance Group
4544 Sheppard Avenue East, Suite 130
Toronto, Ontario M1S 1V2, Canada

AA Communications, Inc.
261 Oakmont Drive
New Orleans, LA 70128

Craig Greene c/o Thomas Shahady
Adorno & Yoss LLP
350 East Las Olas Blvd., Suite 1700
Ft. Lauderdale, FL 33301

/s/Justin R. Giles, III
JUSTIN R. GILES, III